

TENNESSEE REGULATORY AUTHORITY

Sara Kyle, Chairman
Deborah Taylor Tate, Director
Pat Miller, Director
Ron Jones, Director



2003 JUN 16 AM 8:08

T.R.A. DOCKET ROOM
460 James Robertson Parkway
Nashville, Tennessee 37243-0505

June 13, 2003

Mr. Charles L. Howorth, Jr.
Vice President-Regulatory
BellSouth Telecommunications, Inc.
Suite 2104
333 Commerce Street
Nashville, Tennessee 37201-3300

Dear Mr. Howorth:

United Way of Metropolitan Nashville ("Petitioner") has filed the attached petition with the Authority for the allocation of N11 number 211 pursuant to BellSouth's tariff A39. The Petitioner seeks allocation of the 211 abbreviated dialing code for Davidson County, Rutherford County, Williamson County, Sumner County, Wilson County, Robertson County, Cheatham County, Dickson County, Cannon County and Trousdale County. This matter has been assigned Docket No. 03-00383. Please inform the Authority by June 20, 2003 if the N11 number 211 is in use and, by whom (name and address).

If you have any questions concerning the matter, please call Patsy Fulton at 615-741-2904 ext. 193.

Yours truly,

Joe Werner, Chief
Telecommunications Division
Attachment (1)

BEFORE THE TENNESSEE REGULATORY AUTHORITY
NASHVILLE, TENNESSEE

RECEIVED

2003 JUN -5 AM 9:57

IN RE:

PETITION OF UNITED WAY OF
METROPOLITAN NASHVILLE FOR
ALLOCATION OF AN N11 NUMBER
(ABBREVIATED DIALING CODE)

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I.R.A. DOCKET ROOM

TRA Docket No.

03-00383

PETITION FOR ALLOCATION OF AN N11 NUMBER

The United Way of Metropolitan Nashville ("Petitioner") respectfully submits this Petition for Allocation of an N11 Number (211) for the purpose of providing health and human services information and referral to citizens in Middle Tennessee.

INTRODUCTION

1. Petitioner is a charitable not-for-profit corporation, qualified as tax exempt under Section 501(c)(3) of the Internal Revenue Code (the "Code"), with its principal place of business in Nashville, Tennessee.

2. Petitioner funds local social service programs conducted by community service organizations in the Middle Tennessee region that are qualified as tax exempt under Section 501(c)(3) of the Code. Allocation of United Way funding is primarily determined by local volunteers who assess need priority among potential recipients of United Way funding. There are currently 186 programs in 87 agencies that receive funding from United Way of Metropolitan Nashville.

NUMBERING RESOURCE AS TO WHICH ALLOCATION IS SOUGHT

3. Petitioner seeks allocation of the 211 abbreviated dialing code for Davidson County, Rutherford County, Williamson County, Sumner County, Wilson County, Robertson County, Cheatham County, Dickson County, Cannon County, and Trousdale County (the "Proposed Coverage Area").

STANDARD FOR GRANT OF PETITION

4. In its July 31, 2000 Order (the "FCC Order"), CC Docket No. 92-105, ¶ 2, the Federal Communications Commission (the "FCC") expressly reserved the 211 abbreviated dialing code for "community information and referral services."

5. Pursuant to the October 20, 1993 Order (the "TRA Order"), Docket No. 92-13892, issued by the Tennessee Public Service Commission, the following factors and criteria are used to select the most qualified applicant for an allocation of N11 number resources:¹ (i) overall financial fitness, both historical and future; (ii) overall ability (technical ability and otherwise) and willingness to provide service on a permanent and continuous basis; (iii) ability and willingness to abide by Tennessee Regulatory Authority ("TRA") rules and policies; (iv) rates, services and collection practices to be utilized by petitioner in the provision of N11 service; (v) extent and duration of petitioner's service to the local community included in the N11 allocation; (vi) anticipated future uses by the community of the proposed service to be offered by the petitioner and the petitioner's overall experience providing information to the community to be served; and (vii) the type of information services to be provided by petitioner through an abbreviated dialing code, and its relative value to the public and local community. In addition, a petitioner for allocation of N11 number resources must agree to abide by the terms, conditions and rates for N11 service, which shall not exceed those set forth in the applicable Tariff.

REASONS SUPPORTING ALLOCATION OF N11

6. Petitioner seeks to utilize the 211 abbreviated dialing code for provision of community information and referral services, pursuant to the TRA Order and FCC Order.

¹ See July 14, 2000 TRA Order, Docket No. 99-00743, reallocating 211 abbreviated access code to Knoxville Information and Referral, Inc. and applying factors pursuant to the TRA Order.

7. Although, pursuant to TRA Docket No. 98-00554, the 211 abbreviated access code for the Nashville metropolitan exchange had been assigned to National Telephone Enterprises for voice personal dating services, the subsequent FCC Order effectively recalls that assignment, reserving the 211 abbreviated access code for "community information and referral services." Such "community information and referral services" specifically are the type of services that Petitioner proposes to provide through the abbreviated access number.

8. Petitioner satisfies the criteria set forth in the TRA Order:

(a) Overall Financial Fitness, Both Historical and Future. Beginning in 1922 the Nashville community joined together to raise funds to support the efforts of non-profit agencies that provide help to those in need in our community. In 1954 this community effort was incorporated as the United Way, which raised slightly over \$1 million in that year's campaign. Last year, the United Way of Metropolitan Nashville raised in excess of \$23 million. The organization currently (2001 audit) has unrestricted net assets in excess of \$900,000 and more than \$4 million in endowment funds. A multi-year strategic plan is in place that will continue this aggressive growth in fund raising to support priority programs that serve people in need in the Nashville area community. United Way has the active support of key business and community leaders on its Board of Trustees and committees to insure continued future financial success of the organization. In addition, Petitioner will solicit additional funding for the operation of the abbreviated access number service from public sources and corporate and individual donors. Petitioner's 2001 consolidated financial statements and proposed budget for 211 service for the first and second years of operation are attached hereto as Exhibits A and B, respectively.

(b) Overall Ability (Technical Ability and Otherwise) and Willingness to Provide Service on a Permanent and Continuous Basis. If allocated an abbreviated dial code, Petitioner will

provide N11 service on a permanent and continuous basis. To that end, Petitioner intends to retain *Crisis Intervention Center, Inc.* to provide ongoing 24-hour, 7-day per week, 365-days per year abbreviated access number service coverage and First Call for Help to provide coverage for calls originating in Rutherford and Cannon Counties (First Call for Help is open Monday – Friday, 8:00 AM – 5:00 PM, non-holidays; evening, weekend, and holiday calls from Rutherford and Cannon Counties will be answered by Crisis Intervention Center). The Crisis Intervention Center has a long-standing relationship with United Way to provide information and referral services for people in the Nashville area community. The Crisis Intervention Center has been serving Nashville since 1968. The Center's core services are 24-hour crisis counseling, suicide prevention and information referral by phone. The Center handles over 50,000 calls a year from people needing Information and Referral services or crisis counseling. The Crisis Intervention Center is certified by the American Association of Suicidology, and is a member of the Alliance of Information and Referral Systems (AIRS). The Crisis Intervention Center's programs are provided by 44 employees and over 75 volunteers. The Crisis Intervention Center employees will process calls received pursuant to written guidelines for the handling of inquiries. In addition, The Crisis Intervention Center will provide regular reports to Petitioner and its Board of Directors regarding abbreviated access number operations. First Call For Help is a comprehensive information and referral service of United Way of Rutherford County. Operating since 1998, the program serves residents of Rutherford and Cannon counties. Services are provided by a staff of 5 (3 FTE's) and 5 volunteers. First Call For Help is an AIRS affiliate and the director is a certified Information and Referral Specialist. First Call For Help receives approximately 7,500 calls per year.

(c) Ability and Willingness to Abide by TRA Rules and Policies. Petitioner will comply with all present and future rules promulgated by the TRA, including without limitation those applicable to abbreviated access dialing service.

(d) Rates, Services and Collection Practices to Be Utilized by Petitioner in the Provision of N11 Service. As more particularly described in Paragraph 1, above, Petitioner is a not-for-profit entity committed to providing free community information and referral services to the population of the Proposed Coverage Area. Petitioner proposes to pay all charges incurred in connection with the assignment and utilization of the abbreviated access code and the costs of ongoing operation of the abbreviated access number service, other than any applicable user-generated charges resultant from access to the service by cellular phone.

(e) Extent and Duration of Petitioner's Service to the Local Community Included in the N11 Allocation. Since 1954, Petitioner has been committed to community service in the metropolitan Nashville area and has developed a close relationship with social service providers in the Proposed Coverage Area in a cooperative effort to enhance and improve the delivery of beneficial services to the community. Formed in 1954, Petitioner's mission is to "bring people and organizations together to create a community where individuals, families, and neighborhoods thrive." The provision and support of a 211 service for Middle Tennessee residents aligns with the mission and historical service commitment of United Way.

(f) Anticipated Future Uses by the Community of the Proposed Service to Be Offered by the Petitioner and the Petitioner's Overall Experience Providing Information to the Community to Be Served. Petitioner has a long history of providing information to the metropolitan Nashville community. Each year United Way publishes a "Guide to Funded Services" that provides descriptive information about the services offered by agencies and programs that receive United

Way dollars. Through the annual workplace campaign, 270,000 people receive information through campaign literature (that includes the Information and Referral Helpline number), videos, advertising and speaker presentations. United Way also provides program outcome data to its donors and stakeholders that demonstrate changes in peoples' lives as a result of the programs supported by United Way. All organizational financial information is freely available to the public and United Way participates in an independent public audit each year. The organization has a web site where information is posted and any person may contact United Way via e-mail or telephone for information. Moreover, Petitioner anticipates that its ongoing strong relationship with social services and community information concerns will continue. Because the availability of a uniform telephone access number for community information and social services would significantly reduce confusion or frustration regarding services available in the metropolitan Nashville area, while enhancing the likelihood that people in need of assistance will be directed to those specific services that would be most appropriate for and responsive to their needs, it is anticipated that a significant number of Middle Tennesseans will utilize the abbreviated access code system proposed by Petitioner. Petitioner expects between 50,000 and 65,000 calls during the first twelve months of operation of the 211 service.

(g) The Type of Information Services to Be Provided by Petitioner Through an Abbreviated Dialing Code, and its Relative Value to the Public and Local Community. Through the abbreviated access number service, Petitioner would serve population of the Proposed Coverage Area, providing free information regarding community service organizations and referral guidance to individuals seeking social services and other assistance. A 211 service would tend to reduce any confusion among citizens of the Proposed Coverage Area concerning the availability of social and community services from the thousands of community service organizations located therein. Thus,

through the institution of Petitioner's abbreviated access number service, individuals in need of social or community service would have access to an increased number of social services which would be made available on a more uniform basis.

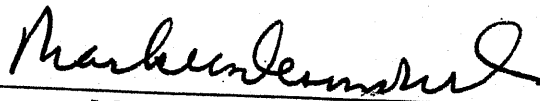
(h) Agreement to Abide by Terms, Conditions and Rates for N11 Service. Petitioner agrees to abide fully by the terms, conditions and rates for N11 service set by the TRA and embodied in the Tariff. As described above in Paragraph 8(d), Petitioner expects to bear all costs of operating the N11 service, other than cellular phone connection and time charges. Therefore Petitioner's N11 rates would not exceed those set forth in the applicable Tariff.

CONCLUSION

9. Petitioner respectfully requests that the TRA allocate the 211 abbreviated dialing code for the Proposed Coverage Area.

Respectfully submitted,

Date: May 22, 2003



Mark H. Desmond, President & CEO
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